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5 *Attorneys for Creditor*  
6 *D.A. Wood Construction, Inc.*

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8 **UNITED STATES BANKRUPTCY COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

11 In re:  
12 PG&E CORPORATION,  
13 -and-  
14 PACIFIC GAS AND ELECTRIC COMPANY,  
15 Debtors.

- 16 ☐ Affects PG&E Corporation  
17 ☐ Affects Pacific Gas and Electric Company  
18 ☒ Affects both Debts

19 *\*All papers shall be filed in the Lead Case, No.  
19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF JOSH  
MALCOM IN SUPPORT OF  
CREDITOR D.A. WOOD  
CONSTRUCTION INC.'S RESPONSE  
TO REORGANIZED DEBTOR'S  
FORTY-FOURTH OMNIBUS  
OBJECTION TO CLAIMS**

20 I, Josh Malcom, declare:

21 1. I am an individual over the age of 18 years and am employed as the controller for D.A.  
22 Wood Construction, Inc. ("D.A. Wood"), a creditor in the above-entitled action.

23 2. I have personal knowledge of the facts stated in this declaration except as to those matters  
24 stated on information and belief, and as to those matters, I believe them to be true. If called as a  
25 witness, I could and would competently testify thereto.

26 3. On or around April 22, 2016, a gas line owned/operated by Pacific Gas and Electric  
27 Company ("PG&E") was broken in the course of construction work. I am informed and believe  
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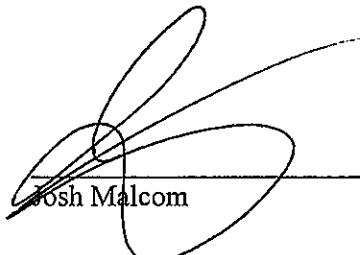
1 that PG&E failed to properly identify and mark said gas line to safeguard it and individuals from  
2 harm.

3 4. D.A. Wood incurred costs and expenses as a result of PG&E's failure to properly identify  
4 and mark the gas line at issue; including but not limited to, costs to immediately protect and  
5 safeguard the public from PG&E's leaking gas line.

6 5. On or around April 22, 2016, I was told by Jason Price, a superintendent with PG&E, to file  
7 a claim with PG&E for the costs and expenses D.A. Wood incurred as a result of the rupture of the  
8 gas line at issue. Thereafter, D.A. Wood filed a claim with PG&E in the amount of \$27,009.30 (the  
9 "Claim Amount").

10 6. As of November 30, 2020, no portion of the Claim Amount has been paid to D.A. Wood.

11 I certify under penalty of perjury that the foregoing is true and correct. Executed on this  
12 30<sup>th</sup> day of November, 2020.

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